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May 19, 2005

National Organic Standards Board
C/O Arthur Neal
Room 4008 - South Building
1400 and Independence Avenue SW
Washington, DC 20250-0001

Dear Mr. Neal:

I have been an organic grower of hay and grain for organic dairies for 12 years. I am very concerned over proposed rules by the NOSB in section 205.239(a)(2) of the National Organic Program, published for public comment on March 22, 2005.

The restrictions of sections A & C could slow down the organic dairy business in Southern Idaho and even cause the closure of some dairies. This is at a time when the demand for organic dairy products is increasing to the point of exceeding supply. I am very worried that this clause could hurt both myself and other organic feed producers.

The requirement for "30% dry matter intake on a daily basis during the growing season and not less than 120 days" is very arbitrary and does not apply to every geographical area with climates and soil types that differ. Individual farms and organic certifiers should be given the freedom to develop a good organic farm plan that upholds organic standards and works well in the specific location of the farm.

The NRCS grazing policy is set up for beef cattle grazing where animals are grazing on range for weeks or months at a time. The NRCS grazing policy would not be a good way to manage dairy cattle pasture operations.

Thank-you for your time.

Sincerely,



Teri Backstrom
Backstrom Farms